BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF GEORGIA

:

IN RE: Agreed-Upon Procedures Report Docket No. 32235

:

STATE OF GEORGIA,

TAYLOR COUNTY:

AFFIDAVIT

Personally came and appeared before me, the undersigned Notary, the within named James L. Bond, who is a resident of Bibb County, State of Georgia, and makes this his statement and Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, fact and things set forth below are true and correct to the best of his knowledge.

Public Service Telephone Company submits herewith its response to the UAF Agreed-Upon Procedures Report pursuant to the requirements in Docket No. 32235 in compliance with Georgia Public Service Commission Utility Rule 515-3-1-11. Said filing includes Company operational and financial data which the Company designates as trade secret and protected information as those terms are defined and used in O.C.G A §10-1-761(4).

The information derives economic value to the Company and to the Company's customers from not being generally known to others. Public Service Telephone Company submits the data as highly confidential and competitively sensitive. Accordingly, consistent with the Company's own interests, and the interests of its customers, the Company protects against disclosure of this information.

James L. Bond
President

Sworn to and subscribed before me, the Undersigned Notary Public, the 21st day of June 2024

Notary Public
My Comission expires April 27, 2025



HURLBERT CPA
regulatory audit services

Public Service Telephone Company

Agreed-Upon Procedures Applied to the Universal Access Fund Application for the period ending 6/30/2023

May 3, 2024

P.O. Box 615 | Liberty, MO 64069 p 816.309.2682 f 816.429.6789 info@hurlbertcpa.com www.hurlbertcpa.com

Independent Accountant's Report on Applying Agreed-Upon Procedures

PUBLIC SERVICE TELEPHONE COMPANY

To the Georgia Public Service Commission:

We have performed the procedures enumerated below on the application for funding from the Georgia Universal Access Fund provided to us by management of Public Service Telephone Company (or the "Company"). The responsible party Public Service Telephone Company is responsible for the application.

The engaging party, Georgia Public Service Commission ("GPSC") has agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of assessing the application's reasonableness prior to funds being distributed to Public Service Telephone Company as of June 30, 2023. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures are listed below with associated findings listed on the following pages.

AUP	Agreed-Upon Procedures
1	Obtain UAF company pre-filed information and schedules filed with the GPSC
2	Issue specific Contractor data requests to the UAF Companies and schedule field work
3	Audit the Company's UAF model (printed version as well as spreadsheet testing)
4	Trace amounts on the Applicant's Form M back to Company prepared schedules matching their General Ledger
5	Trace Form M data to the UAF Model column entitled Balance Per Books
6	Trace amounts in the "subject to separations" adjustment column of the UAF Model to Net Operating Income (NOI) and Rate of Return (ROR) on rate base calculations
7	Trace amounts in the "non-regulated" adjustment column of UAF Model to supporting journal entries of cost study. Selected supporting work papers are reviewed for reasonableness, accuracy, and conformance.
8	Test the FCC Part 36 study and review allocation/traffic factors
9	Test and recalculate the Revenue Requirement Section on the UAF Model
10	Review each invoice over $250 and select those invoices that appear unreasonable
11	Review corporate allocations and the Company's Cost Allocation Manual

12 Verify fixed asset amounts in the Company's Continuing Property Record and identify those assets that are inappropriately included in rate base in the UAF application. If applicant is a recipient of Federal or state Broadband Grants, determine whether the grants were to be used as revenue, expense offsets, or for capital acquisitions. To the extent such grants are/were used for capital acquisition, review books to ensure that such purchased assets are excluded from the rate base for UAF purposes

13 Verify the amounts of Federal universal service fund support reported in the UAF Application. Review UAF Applicant work

14 Verify that any long-term debt interest costs treated as AFUDC (Allowance for Funds Used During Construction) were treated either as current year income or as a reduction to interest rates

15 Verify that any Patronage Dividends credited (not necessarily received in cash) from long term lenders are treated as a reduction to the cost of debt

16 Review the outside auditor's report on the financial statements and report any adverse findings or qualified opinions

17 Review and test the requested amount for Executive Compensation and Corporate Operations Expense and compared the amount shown in the UAF application to the GPSC caps

18 Review depreciation rates used for the UAF application and compare to the rates adopted by the GPSC

19 Review cost allocation manual, verify that it is being used, test a sample of allocations and report when the manual was last updated

20 Incorporate revised factors or methods adopted by GPSC, such as cost of equity, into the UAF model

21 Prepare exhibits of financial results and support mechanisms. Analyze as to why increases/decreases occurred

22 Identify Construction Work in Progress and Retirement amounts for the test year

23 Identify the Company's affiliates and non-regulated services

24 Identify the total costs charged to the regulated company by the affiliate or parent company. Quantified costs by FCC USOA Account and determined the per access line amount over the past 3 years. If the costs appear unreasonable, propose adjustments or informed GPSC staff and recommend an affiliated transactions engagement be performed

25 For ACAM UAF companies only, obtain the Company spreadsheet depicting calculated amounts, review Company prepared adjustments, trace adjustments in the UAF application model to the spreadsheet and identify impact of the adjustment

26 Test and review the Approved Cost of Equity and Cost of Capital Rates of Tier II local exchange carriers for the purpose of evaluating applications for reimbursement from the UAF. The rate of return on rate base will be limited to the lesser of 8.0% or the level computed based on a 9.25% return on equity, using the applicant's actual cost of debt and the applicant's actual debt/equity structure. Verify that the above calculation was used in the respective UAF Model

27 Finalize work papers and prepare final report

28 Prepare testimony if requested.

We were engaged by the GPSC to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct and examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the application. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of Public Service Telephone Company and to meet our other ethical responsibilities, in accordance with relevant ethical requirements related to our agreed-upon procedures engagement. This report is intended solely for the information and use of the Georgia Public Service Commission and Public Service Telephone Company and is not intended to be, and should not be, used by anyone other than these specified parties.

Vic Hurlbert, CPA
Hurlbert CPA LLC
Liberty, Missouri
May 3, 2024

Current Request for UAF Disbursements – Summary of Findings

Public Service Telephone Company's final revenue deficiency is [redacted]. We have no proposed adjustments.

Table 1
Public Service Telephone Company

Georgia UAF Summary	Amounts
Original Company Requested Amount from Georgia Universal Access Fund	[redacted]
Total Adjustments	[redacted]
Revised Deficiency for the Company	[redacted]
Final Amount Recommended by Staff	[redacted]

As presented in Table 1, we propose Public Service Telephone Company receive a UAF disbursement of [redacted] based upon the test year for the twelve months ending June 30, 2023.

Profile of Public Service Telephone Company

Public Service Telephone Company is located in Reynolds, Georgia and provides telephone service to approximately [redacted] customers in [redacted] exchanges throughout central Georgia.

Agreed-Upon Procedures

Procedure 1: Obtained UAF company pre-filed information and schedules filed with the GPSC.

Conclusion – [redacted].

Procedure 2: Issued specific Contractor data requests to the UAF Companies and scheduled field work.

Conclusion – [redacted].

Procedure 3: Audited the Company's UAF model (printed version as well as spreadsheet testing).

Conclusion – [redacted].

Procedure 4: Traced amounts on the Applicant's Form M back to Company prepared schedules matching their General Ledger.

Conclusion – [redacted].

Procedure 5: Traced Form M data to the UAF Model column entitled Balance Per Books

Conclusion – [redacted].

Procedure 6: Traced amounts in the "subject to separations" adjustment column of the UAF Model to Net Operating Income (NOI) and Rate of Return (ROR) on rate base calculations.

Conclusion – [redacted].

Procedure 7: Traced amounts in the "non-regulated" adjustment column of UAF Model to supporting journal entries of cost study. Selected supporting work papers are reviewed for reasonableness, accuracy, and conformance.

Conclusion – [redacted].

Procedure 8 Tested the FCC Part 36 study and review allocation/traffic factors.

Conclusion – [redacted]

Procedure 9: Tested and recalculated the Revenue Requirement Section on the UAF Model.

Conclusion – [redacted]

Procedure 10: Reviewed each invoice over $250 and select those invoices that appear unreasonable.

Conclusion – [redacted].

Procedure 11: Reviewed corporate allocations and the Company's Cost Allocation Manual

Conclusion – [redacted].

Procedure 12 Verified fixed asset amounts in the Company's Continuing Property Record and identify those assets that are inappropriately included in rate base in the UAF application. If applicant is a recipient of Federal or state Broadband Grants, determined whether the grants were to be used as revenue, expense offsets, or for capital acquisitions. To the extent such grants are/were used for capital acquisition, review books to ensure that such purchased assets are excluded from the rate base for UAF purposes.

Conclusion – [redacted].

Procedure 13 Verified the amounts of Federal universal service fund support reported in the UAF Application. Review UAF Applicant work.

Conclusion – [redacted]

Procedure 14: Verified that any long-term debt interest costs treated as AFUDC (Allowance for Funds Used During Construction) were treated either as current year income or as a reduction to interest rates.

Conclusion – [redacted].

Procedure 15: Verified that any Patronage Dividends credited (not necessarily received in cash) from long term lenders are treated as a reduction to the cost of debt.

Conclusion – [redacted].

Procedure 16: Reviewed the outside auditor's report on the financial statements and report any adverse findings or qualified opinions.

Conclusion – [redacted]

Procedure 17: Reviewed and tested the requested amount for Executive Compensation and Corporate Operations Expense and compared the amount shown in the UAF application to the GPSC caps.

[redacted]

[redacted]

Conclusion – [redacted]

Procedure 18: Reviewed depreciation rates used for the UAF application and compared to the rates adopted by the GPSC.

Conclusion – [redacted]

[redacted]

[redacted]

Procedure 19: Reviewed cost allocation manual, verify that it is being used, test a sample of allocations and report when the manual was last updated.

Conclusion – [redacted]

Procedure 20: Incorporated revised factors or methods adopted by GPSC, such as cost of equity, into the UAF model.

Conclusion - [redacted]

Procedure 21: Prepare exhibits of financial results and support mechanisms. Analyzed as to why increases/decreases occurred.

Financial Results 2018 – 2023

Description	2018	2019	2020	2021	2022	2023
Net telecom plant	[redacted]					
Operating Revenues	[redacted]					
Operating Expenses	[redacted]					
Operating income/(loss)	[redacted]					
Access Lines	[redacted]					

Receipt of Federal Universal Service Support 2018 – 2023

Support	2018	2019	2020	2021	2022	2023
HCLS	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
ICLS	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
LSS	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
SNA	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
SVS	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Lifeline	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

Conclusion – [redacted]

Procedure 22: Identify Construction Work in Progress and Retirement amounts for the test year.

Conclusion – [redacted].

Procedure 23 Identify the Company's affiliates and non-regulated services.

[redacted]

[redacted]

Conclusion – [redacted]

Procedure 24 Identify the total costs charged to the regulated company by the affiliate or parent company.

[redacted]

[redacted]

Procedure 25 For ACAM UAF companies only, obtain the Company spreadsheet depicting calculated amounts, Reviewed Company prepared adjustments, trace adjustments in the UAF application model to the spreadsheet and identify impact of the adjustment.

Conclusion – [redacted].

Procedure 26 Test and Reviewed the Approved Cost of Equity and Cost of Capital Rates of Tier II local exchange carriers for the purpose of evaluating applications for reimbursement from the UAF. The rate of return on rate base will be limited to the lesser of 8.0% or the level computed based on a 9.25% return on equity, using the applicant's actual cost of debt and the applicant's actual debt/equity structure. Verify that the above calculation was used in the respective UAF Model.

Conclusion – [redacted].

Procedure 27 Finalize work papers and prepare final report.

Procedure 28 Prepare testimony if requested.

Exhibit Nos. 1 – 3

1. Public Service Telephone Company Organization Chart
2. Public Service Telephone Company UAF Net Operating Income and Rate of Return on Rate Base Calculation
3. Public Service Telephone Company UAF Cost of Capital Structure and Return on Equity Calculation

Exhibit One

REDACTED – Trade Secret

REDACTED – Trade Secret

REDACTED - Trade Secret